

# **EXHIBIT 64**

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**From:** Andrew R. Kurland <AKurland@kasowitz.com>  
**Sent:** Monday, June 17, 2019 10:14 AM  
**To:** JDellaportas@EMMETMARVIN.COM  
**Cc:** MBowen@kasowitz.com  
**Subject:** RE: Genger v. Genger

Thanks I think we are there. But to avoid any dispute, we will review the unredacted papers you sent and indicate the portions which should remain redacted (ie, those concerning the premarital agreement) to ensure we have the same understanding.

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**From:** John Dellaportas [mailto:JDellaportas@EMMETMARVIN.COM]  
**Sent:** Monday, June 17, 2019 9:45 AM  
**To:** Andrew R. Kurland <AKurland@kasowitz.com>  
**Cc:** Michael Paul Bowen <MBowen@kasowitz.com>  
**Subject:** RE: Genger v. Genger

Andrew, so to be clear, we agree to your requested extension and you agree that: (a) we have three weeks for any reply, and (b) any other interested party who signs the Protective Order can get the full set of papers redacted only as to "any redacted portions of [the] motion that concern Orly's premarital agreement, or the agreement itself, including any testimony about it." Please confirm. Thanks. John

**John Dellaportas**  
**Co-Chair, Litigation Department**  
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**EMMET**  
EMMET, MARVIN & MARTIN, LLP

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**From:** Andrew R. Kurland [<mailto:AKurland@kasowitz.com>]  
**Sent:** Monday, June 17, 2019 9:38 AM  
**To:** John Dellaportas  
**Cc:** Michael Paul Bowen  
**Subject:** RE: Genger v. Genger

Thanks. We are fine with the additional time you seek on the reply, but we have discussed with Arie Genger and the Brosers our unwillingness to allow any of them to see any redacted portions of your motion that concern Orly's premarital agreement, or the agreement itself, including any testimony about it. They told us that they have not been served with anything yet, but they agree that this information is irrelevant to them in any case, so they do not need to see any of it. Therefore, no additional motion practice will be required with respect to the papers. Please confirm we have an agreement. Thank you.

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**From:** John Dellaportas [<mailto:JDellaportas@EMMETMARVIN.COM>]  
**Sent:** Friday, June 14, 2019 4:19 PM  
**To:** Andrew R. Kurland <[AKurland@kasowitz.com](mailto:AKurland@kasowitz.com)>  
**Cc:** Michael Paul Bowen <[MBowen@kasowitz.com](mailto:MBowen@kasowitz.com)>  
**Subject:** RE: Genger v. Genger

Andrew, the extension is fine, provided (a) we have three weeks for any reply (the extension would put the reply period at the same time as a long planned vacation), and (b) you agree that any other interested party (e.g., Arie, Brosers) who signs the Protective Order can get the unredacted set of papers, as this will avoid a lot of unnecessary motion practice and delay. Please let us know. John

**John Dellaportas**  
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**From:** Andrew R. Kurland [<mailto:AKurland@kasowitz.com>]  
**Sent:** Thursday, June 13, 2019 12:28 PM  
**To:** John Dellaportas  
**Cc:** Michael Paul Bowen  
**Subject:** Fwd: Genger v. Genger

The email I sent earlier today, forwarded below, bounced back to me. I see that this may be your new email address. Please confirm receipt, and whether you consent to the extension. Thank you.

Andrew R. Kurland  
Kasowitz Benson Torres LLP  
1633 Broadway  
New York, New York 10019  
Tel. (212) 506-3306  
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[AKurland@kasowitz.com](mailto:AKurland@kasowitz.com)

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Begin forwarded message:

From: "Andrew R. Kurland" <[AKurland@kasowitz.com](mailto:AKurland@kasowitz.com)<<mailto:AKurland@kasowitz.com>>>  
Date: June 13, 2019 at 9:57:09 AM GMT+2  
To: "Dellaportas, John" <[JDellaportas@KelleyDrye.com](mailto:JDellaportas@KelleyDrye.com)<<mailto:JDellaportas@KelleyDrye.com>>>  
Cc: Michael Paul Bowen <[MBowen@kasowitz.com](mailto:MBowen@kasowitz.com)<<mailto:MBowen@kasowitz.com>>>  
Subject: RE: Genger v. Genger

John, This is received, but Mike and I are currently both out of the country. Due to personal and other professional commitments that we each have in the coming weeks, we need a 30 day extension to respond. If my math is correct I believe that would make our response due by 7/25. Please let us know if you consent. Thank you.

From: Dellaportas, John [<mailto:JDellaportas@KelleyDrye.com>]  
Sent: Wednesday, June 12, 2019 5:52 AM  
To: Michael Paul Bowen <[MBowen@kasowitz.com](mailto:MBowen@kasowitz.com)<<mailto:MBowen@kasowitz.com>>>; Andrew R. Kurland <[AKurland@kasowitz.com](mailto:AKurland@kasowitz.com)<<mailto:AKurland@kasowitz.com>>>  
Subject: Genger v. Genger

**\*\*External Email\*\***

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Please find attached the redacted portions of this evening's filing.

This message is subject to Kelley Drye & Warren LLP's email communication policy.

KDW-Disclaimer<[https://us-api.mimecast.com/s/site/XujAZpejvFW2OlhYbUKIGx-Ai9xZIDhp72XnOC\\_w53JmUL\\_bIf5Jxgl1Byxk6Bz9-FKLsi0qLdgJNeNHoo9GDYZD\\_Q1XWSjCBBcwhCpAmvE6QFwVL4ALBrEEpNGSoFUQgCxF5yWeMS6Dsz2lp7E6gQ](https://us-api.mimecast.com/s/site/XujAZpejvFW2OlhYbUKIGx-Ai9xZIDhp72XnOC_w53JmUL_bIf5Jxgl1Byxk6Bz9-FKLsi0qLdgJNeNHoo9GDYZD_Q1XWSjCBBcwhCpAmvE6QFwVL4ALBrEEpNGSoFUQgCxF5yWeMS6Dsz2lp7E6gQ)>

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SAN FRANCISCO  
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June 25, 2019

Via ECF

Hon. Vernon S. Broderick  
United States District Judge  
Thurgood Marshall United States Courthouse  
40 Foley Square, Room 415  
New York, NY 10007

Re: *Dalia Genger v. Sagi Genger*, 17-cv-8181-VSB-DF

Dear Judge Broderick:

Pursuant to Rule 1(G) of the Court's Individual Rules & Practices in Civil Cases, the parties hereby jointly make this letter-motion for leave to modify the briefing schedule for the response and reply to judgment creditor Sagi Genger's Motion for Turnover of Promissory Notes and Funds from Garnishees and Rescission of Fraudulent Conveyance, which was filed on June 12, 2019 (ECF Doc. Nos. 212-214) (the "Motion"). Pursuant to the attached stipulation (Exhibit A), the parties have agreed that any response to the Motion shall be filed on or before July 25, 2019, and any reply in further support of the Motion shall be filed on or before August 15, 2019. This is the first request for an extension of time, and is on consent of both parties. Thank you for your consideration of this matter.

Respectfully submitted,

/s/ Andrew R. Kurland

Andrew R. Kurland

# EXHIBIT A

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                  |   |                         |
|----------------------------------|---|-------------------------|
| -----X                           | : |                         |
| DALIA GENDER,                    | : |                         |
|                                  | : | No. 17-cv-08181-VSB-DCF |
| Plaintiff,                       | : |                         |
| -v-                              | : | <b>STIPULATION</b>      |
|                                  | : |                         |
| SAGI GENDER,                     | : |                         |
|                                  | : |                         |
| Defendant/Third-Party Plaintiff, | : |                         |
|                                  | : |                         |
| -v-                              | : |                         |
|                                  | : |                         |
| ORLY GENDER,                     | : |                         |
|                                  | : |                         |
| Third-Party Defendant.           | : |                         |
| -----X                           | : |                         |

WHEREAS, judgment creditor Sagi Genger (“Sagi”) filed a “Motion for Turnover of Promissory Notes and Funds from Garnishees and Rescission of Fraudulent Conveyance” on June 12, 2019 (ECF Doc. Nos. 212-214) (the “Motion”); and

WHEREAS, judgment debtor Orly Genger (“Orly”) has conferred with Sagi about the schedule for submission of responses to the Motion and Sagi’s reply in further support of the Motion;

IT IS HEREBY STIPULATED AS FOLLOWS:

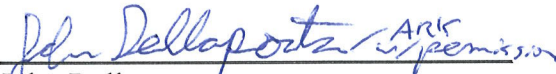
1. Any response to the Motion shall be filed on or before July 25, 2019.
2. Any reply in further support of the Motion shall be filed on or before August 15, 2019.



SO STIPULATED AND AGREED.


Dated: New York, New York  
June 25, 2019

EMMET, MARVIN & MARTIN LLP

  
John Dellaportas  
120 Broadway, 32<sup>nd</sup> Floor  
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(212) 238-3092

*Attorneys for Sagi Genger*

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(212) 506-1903

*Attorneys for Orly Genger*

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

|                                  |   |                         |
|----------------------------------|---|-------------------------|
| -----X                           | : |                         |
| DALIA GENDER,                    | : |                         |
|                                  | : | No. 17-cv-08181-VSB-DCF |
| Plaintiff,                       | : |                         |
| -v-                              | : | <b>STIPULATION</b>      |
|                                  | : |                         |
| SAGI GENDER,                     | : |                         |
|                                  | : |                         |
| Defendant/Third-Party Plaintiff, | : |                         |
|                                  | : |                         |
| -v-                              | : |                         |
|                                  | : |                         |
| ORLY GENDER,                     | : |                         |
|                                  | : |                         |
| Third-Party Defendant.           | : |                         |
| -----X                           | : |                         |

WHEREAS, judgment creditor Sagi Genger (“Sagi”) filed a “Motion for Turnover of Promissory Notes and Funds from Garnishees and Rescission of Fraudulent Conveyance” on June 12, 2019 (ECF Doc. Nos. 212-214) (the “Motion”); and

WHEREAS, judgment debtor Orly Genger (“Orly”) has conferred with Sagi about the schedule for submission of responses to the Motion and Sagi’s reply in further support of the Motion;

IT IS HEREBY STIPULATED AS FOLLOWS:

1. Any response to the Motion shall be filed on or before July 25, 2019.
2. Any reply in further support of the Motion shall be filed on or before August 15, 2019.

SO STIPULATED AND AGREED.

Dated: New York, New York  
June 25, 2019

EMMET, MARVIN & MARTIN LLP

 ARIS  
permissio

John Dellaportas  
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*Attorneys for Sagi Genger*

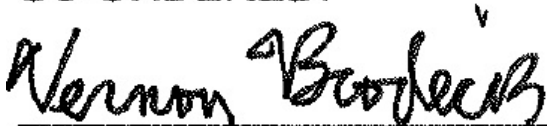
KASOWITZ BENSON TORRES LLP



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*Attorneys for Orly Genger*

**SO ORDERED:**



**HON. VERNON S. BRODERICK** 6/26/2019  
**UNITED STATES DISTRICT JUDGE**